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August 16, 2000

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37245

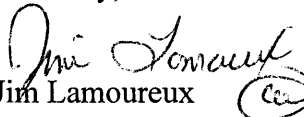
Re: Application of Concert Communications Sales LLC and Concert USA  
for Approval of a Corporate Reorganization Involving Transfers of  
Docket No. 00-00238

Dear Mr. Waddell:

Enclosed please find an original and thirteen copies of Concert Communications Sales LLC's ("CCS") Petition for Approval of a Transfer of Authority and Certification.

Please date-stamp the duplicate and return in the pre-addressed envelope provided. If there are questions regarding this submission, please contact me. Thank you for your assistance with this matter.

Sincerely,

  
Jim Lamoureux

Enclosures

PROCESSED  
8/17/00

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

In Re: Application of Concert Communications )	
Sales LLC and Concert USA for Approval )	Docket No. 00-00238
of a Corporate Reorganization Involving )	
Transfers of Control )	
)	

**PETITION FOR APPROVAL OF A TRANSFER OF AUTHORITY AND  
CERTIFICATION**

On March 21, 2000, Concert Communications Sales LLC ("CCS") filed an Application for Approval of a Corporate Reorganization Involving Transfers of Control ("Application"). The Application described a proposed corporate reorganization within the AT&T Corp. – British Telecommunications, PLC global venture known as Concert (of which CCS is a subsidiary). Central to the reorganization was a request that the certification to provide intrastate telecommunications initially filed by CCS be transferred to Concert USA, an affiliate of CCS. Subsequently, CCS was to be merged into Concert USA. Concert believed that this rearrangement would serve the public interest, permitting significant operating efficiencies as well as one-stop shopping for customers of Concert's end-to-end global telecommunications services, of which the intrastate services provided by CCS are a key component.

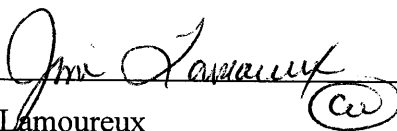
Since the Application was filed and the issuance of the TRA's Order Approving Transfer of Authority dated July 18, 2000, there have been additional changes within the Concert business plan. As a result, the proposed reorganization no longer achieves the beneficial ends originally envisioned, and Concert believes that the operating efficiencies anticipated via the consolidation

of operations into Concert USA will be most fully achieved if CCS continues as the certificated provider of intrastate telecommunications. Therefore, notwithstanding the TRA's July 18<sup>th</sup> Order, CCS requests permission to terminate the authority and certification conferred upon it by the TRA's July 18, 2000, Order, and requests that the TRA allow such authority and certification to revert to CCS, which will continue as the certificated provider of interexchange services in Tennessee.

CCS apologizes for this reversal in course and thanks the TRA for its patience throughout the licensing process. With its organizational issues resolved, CCS looks forward to operating as a provider of intrastate telecommunications services to consumers in the state of Tennessee.

Respectfully submitted,

**CONCERT COMMUNICATIONS SALES LLC**

  
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August 9, 2000